UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

In re:		
Michael J Dinapoli		CASE NO.: 3:17-bk-01656-PMC CH. 13
Debtor.	/	

MOTION TO REINSTATE CASE AND BANKRUPTCY STAY

Debtors, by and through the undersigned counsel move this court for the entry of an order reinstating their Chapter 13 case and the bankruptcy stay and in support thereof state:

- 1. On May 26, 2017, this Court dismissed the above case for Debtors failure to timely file schedules and Chapter 13 Plan.
- 2. Debtor needed additional time to provide the undersigned with the necessary information to complete the schedules.
- 3. Schedules and Plan will be filed within 7 days of this Motion.
- 4. The automatic stay has lapsed prior to the filing of the instant Motion. Debtors request an Order Reinstating the stay under 11 U.S.C. § 362.

WHEREFORE, Debtors pray that this court enter an order reinstating their chapter 13 case and the bankruptcy stay and awarding the Debtors any other relief that is just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished on June 8, 2017 by US Mail and/or electronic mail via CM/ECF to the attached mailing matrix:

/s/ Justin McMurray
Justin McMurray, Esq.
Florida Bar No. 24668

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Label Matrix for local noticing 113A-3

Case 3:17-bk-01656-PMG Middle District of Florida

Jacksonville

Thu Jun 8 18:21:31 EDT 2017

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Page 3 of 4 Ally Financial

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Hann Fncl

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Ford Motor Credit National Bankruptcy Service Center Po Box 62180 Colorado Springs, CO 80962

M & T Bank Bankruptcy Department P.O. Box 840 Buffalo, NY 14240-0810

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